
S T O L L

K E E N O N

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P A R K

L L P

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July 21, 2005

RECEIVED

JUL 22 2005

PUBLIC SERVICE
COMMISSION

Elizabeth O'Donnell
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40601

RE: Case No. 2005-00186 – Time Warner Telecom's Response to Information Requests

Dear Ms. O'Donnell:

Time Warner Telecom of Ohio, LLC ("TWT Ohio") hereby responds to the Commission's June 22, 2005 Order in the referenced proceeding. That Order required telecommunications utilities with "unlimited calling plans" to respond to information requests appended to the Order. In addition, the Commission has ordered utilities with "unlimited calling plans" to respond to data requests from the Attorney General.

TWT Ohio provides voice, data and Internet service to business customers and does not currently provide services to residential customers. TWT does not offer any local or long distance plans described, named, or marketed as "unlimited."

TWT Ohio uses the word "unlimited" in tariffs only to describe services with no restrictions on usage. In its local exchange tariff PSC No. 7, TWT Ohio offers its "Standard Business Line", a flat-rated service with no tariffed limitations on usage. Tariff PSC No. 7, Section 5.2.1, Original Page 91. In addition, TWT Ohio's tariff includes one promotion which uses the word "unlimited" to describe unlimited local and intraLATA calling and access to local directory assistance. The tariffed description for this promotion specifically provides that intraLATA toll usage will not be counted against the allotment of [interLATA] long distance minutes associated with the promotion. Tariff PSC No. 7, Section 8.3.1, Original Pages 193-197. These tariff sections are included as Exhibit 1 to this letter.

As these tariff sections demonstrate, TWT Ohio uses the word "unlimited" in the tariff only to refer to calling services with no restrictions on usage. As there are no restrictions or

Elizabeth O'Donnell
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limitations on these calling plans or promotions, TWT Ohio believes no further response to the information requests is required.

Six copies of this letter are included with this filing. In addition, we are serving one copy to the Attorney General's Office of Rate Intervention. Please indicate receipt of this filing by your office by placing your file stamp on the extra copy and returning to me via the enclosed, self-addressed stamped envelope.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'D. Brent', with a stylized flourish at the end.

Douglas F. Brent
Counsel for Time Warner Telecom of Ohio, LLC

EXHIBIT 1

LOCAL SERVICES TARIFF

SECTION 5 NETWORK SERVICES *continued*

5.2 Standard Business Line

5.2.1 Description of Service

The Standard Business Line provides a Customer with a single, analog, voice-grade telephonic communications channel which can be used to place or receive one call at a time. Standard Business Lines are provided for the connection of Customer-provided wiring and single station sets or facsimile machines. A Flat Rate line includes unlimited local calling within the local calling scope of the originating location. A Message Rate Line includes a monthly recurring charge, plus usage charges applicable to each completed local call within the local calling area. Standard Business Lines sold to IBL Customers may be eligible for discounted rates as indicated.

5.2.2 Rates and Charges

A. Flat Rate Service

1. Non-IBL / VersiPak Customers

| | <u>Monthly</u> | <u>12 Month Term</u> | <u>24 Month Term</u> | <u>36 Month Term</u> | <u>60 Month Term</u> |
|--------------------------|----------------|----------------------|----------------------|----------------------|----------------------|
| Monthly Recurring Charge | \$38.31 | \$37.16 | \$36.05 | \$34.48 | \$32.56 |
| Nonrecurring Charge | \$44.80 | \$44.80 | \$44.80 | \$44.80 | \$44.80 |
| Move Charge | \$44.80 | \$44.80 | \$44.80 | \$44.80 | \$44.80 |
| Change Charge | \$44.80 | \$44.80 | \$44.80 | \$44.80 | \$44.80 |
| Restore Charge | \$44.80 | \$44.80 | \$44.80 | \$44.80 | \$44.80 |

2. Per Line Sold to Qualified IBL / VersiPak Customers

| | <u>12 Month Term</u> | <u>24 Month Term</u> | <u>36 Month Term</u> | <u>60 Month Term</u> |
|--------------------------|----------------------|----------------------|----------------------|----------------------|
| Monthly Recurring Charge | \$37.00 | \$33.50 | \$30.00 | \$27.00 |
| Nonrecurring Charge | \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |
| Move Charge | \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |
| Change Charge | \$44.80 | \$44.80 | \$44.80 | \$44.80 |
| Restore Charge | \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |

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 4625 West 86th Street, Suite 500
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 KYL0407

LOCAL SERVICES TARIFF

SECTION 8 SPECIAL ARRANGEMENTS *continued*

8.3 Special Promotions *continued*

8.3.1 **Go For the Gold Promotion**

(N)

The VersiPak® Go for the Gold promotion consists of three packages combining voice channels, Internet bandwidth, Long Distance, unlimited local calling, Federal Subscriber Line Charge ("FSLC"), and several features – all for one low monthly fee with no installation charge. This promotion is available to new Customers and to existing Customers at a new service location. Wholesale, carrier and ISP Customers are not eligible for this promotion.

A. Promotional Package Description

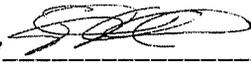
Three promotional packages are available:

| <u>Package</u> | <u>Description</u> |
|----------------|--------------------------------------------------------------------------------------------|
| 6-Pak | 6 Voice channels*, 256K Internet, 2000-2500 LD minutes, Unlimited Local Calling, Features |
| 12-Pak | 12 Voice channels*, 512K Internet, 4000-4500 LD minutes, Unlimited Local Calling, Features |
| 24-Pak | 24 Voice channels*, 1.5M Internet, 5000-5500 LD minutes, Unlimited Local Calling, Features |

*Voice channels can include Business Lines, Terminals, Analog or Digital Trunks, or IPRI

(N)

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 PURSUANT TO 807 KAR 5:011
 Effective: SECTION 8.3.1, August 6, 2004
 By  KYL0414
 Executive Director

LOCAL SERVICES TARIFF

SECTION 8 SPECIAL ARRANGEMENTS *continued*

8.3 Special Promotions *continued*

8.3.1 Go For the Gold Promotion *continued*

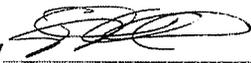
B. Rates and Charges

| Package | Term | Total Channels | MOU Long Distance Included | MRC |
|---------|-------|----------------|----------------------------|------------|
| 6-Pak | 24 mo | 12 | 2000 | \$ 546.00 |
| | 36 mo | 12 | 2500 | \$ 495.00 |
| 12-Pak | 24 mo | 20 | 4000 | \$ 775.00 |
| | 36 mo | 20 | 4500 | \$ 700.00 |
| 24-Pak | 24 mo | 48 | 5000 | \$1,056.00 |
| | 36 mo | 48 | 5500 | \$ 960.00 |

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 Executive Director

LOCAL SERVICES TARIFF

SECTION 8 SPECIAL ARRANGEMENTS *continued*

8.3 Special Promotions *continued*

8.3.1 Go For the Gold Promotion *continued*

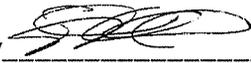
C. Rules Applicable to Local Voice Services

1. Customers purchasing the 12-Pak and 24-Pak packages may mix and match Lines, Trunks, IPRI and Terminals. All voice channels in the 6-Pak package must be of the same type.
2. For 6-Pak and 12-Pak packages, the IPRI Facility is not counted as one of the 6 or 12 channels. It will be considered as one of the 24 voice channels of the 24-Pak package.
3. The long distance minutes of Usage (MOU) will not be applicable to any local usage, local directory assistance, or local operator services.
4. The following features and services are included in the promotional price:
 - Call Blocking per Line
 - Call Hold
 - Last Call Return
 - Caller ID per Line
 - Calling Name
 - Automatic Redial
 - Call Waiting
 - Three-Way Calling
 - Up to 100 Individual Telephone Numbers per Digital Trunk or IPRI
 - One Hunt Group per Digital Trunk or IPRI
 - One Directory Listing
 - Federal Subscriber Line Charge
 - Unlimited Local Directory Assistance (excludes foreign 411, 1+411 or 555-1212)
 - Extended Area Calling (where available)
 - Unlimited LATA-wide Calling

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LOCAL SERVICES TARIFF

SECTION 8 SPECIAL ARRANGEMENTS *continued*

8.3 Special Promotions *continued*

8.3.1 Go For the Gold Promotion *continued*

D. **Rules Applicable to the Long Distance Services**

- A. If the Customer does not use the entire amount of packaged free minutes, the unused minutes will NOT carry over to the next month.
- B. The long distance minutes will be applicable to both 1+ and 8XX toll free long distance calls. Traffic not eligible for the long distance minutes includes: local traffic; traffic to Alaska, Hawaii (excludes customers located in Hawaii), Puerto Rico, U.S. Virgin Islands, Guam, Canada, Mexico and international destinations; long distance directory assistance and operator services; switchless long distance services; and calling card Services.
- C. This promotion cannot be shared across multiple locations. A package can be shared across TWTC dial tone services at the same location. Multiple packages may not be combined together.
- D. Any long distance minutes that exceed the allotted amount will be charged at the standard tariffed rate.
- E. IntraLATA toll usage will not be counted against allotment of long distance minutes.

(N)

(N)

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LOCAL SERVICES TARIFF

SECTION 8 SPECIAL ARRANGEMENTS *continued*

8.3 Special Promotions *continued*

8.3.1 Go For the Gold Promotion *continued*

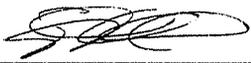
E. **General Rules**

1. This promotion is effective August 6, 2004 through October 29, 2004. Service agreement must be executed by close of business on October 24, 2004. Service must be activated no later than December 1, 2004.
2. This promotion can not be combined with any other promotional offers.
3. All applicable taxes and surcharges will be applied as appropriate and will not be discounted as part of the promotion.
4. Standard rates for Move, Add, Change and Restore charges apply under this promotion.
5. Promotional pricing is for On-Net connection. Additional charges may apply for Off-Net connection.
6. Termination Liability as specified elsewhere in this tariff applies to early termination of service.
7. There is no limit to the number of Local Voice Service facilities a Customer may purchase at the promotional rate.

(N)

(N)

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